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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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	:	
In re	:	Chapter 11
	:	
CHINOS HOLDINGS, INC., et al.,	:	Case No. 20-32181 (KLP)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
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**PROPOSED AGENDA FOR HEARING
ON SEPTEMBER 24, 2020, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Parties may participate in this hearing by registering through the following link:

<https://www.zoomgov.com/meeting/register/vJIsfuyrj8tGoZUAPmaSMQoBo6B03ti1hU>

Parties who wish to attend this hearing, but do not intend on participating in the hearing (listen-only) may do so by using the following dial-in number:

Conference Line: 1-888-363-4735
Access Code: 8617460
Security Code: 0924

Conference Line: 1-888-636-3807
Access Code: 8233381
Security Code: 0924

I. ADJOURNED MATTERS

1. **“Cure Notice”** – *Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 667] (the **“Initial Cure Notice”**)

Related Documents:

- (a) *Supplemental Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 714] (the **“Supplemental Cure Notice”**)
- (b) *Notice of Filing of Amendments to Cure Notice* [ECF No. 903] (**“Amended Cure Notice”**)

Response Deadline: Except as expressly agreed among the Reorganized Debtors and any applicable party in interest, (i) the response deadline with respect to the contracts and leases included in the Cure Notice was August 13, 2020 at 4:00 p.m. (Eastern Time), (ii) the response deadline with respect to the contracts and leases included in the Supplemental Cure Notice was August 14, 2020 at 4:00 p.m. (Eastern Time); and (iii) the response deadline with respect to the contracts and leases included in the Amended Cure Notice was September 17, 2020 at 4:00 p.m. (Eastern Time).

Responses (collectively, the **“Cure Objections”**):

- (a) *TSO Warehouse Row Property Owner L.P.’s Limited Objection to Debtors’ Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 702]
- (b) *The Taubman Landlords’ Objection to the Notice of the Proposed (I) Assumption and Assignment or Transfer of Executory Contracts and Unexpired Leases and (II) Cure Amounts* [ECF No. 704]
- (c) *Objection of SG 211-217 Columbus Avenue LLC to the Debtors’ Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 710]
- (d) *Limited Objection to Cure Amount* [ECF No. 713] filed by 50 Hudson, LLC
- (e) *Objection to Debtors’ Designated Cure Amount* [ECF No. 715] filed by CPBP-VII Associates, L.P.
- (f) *Objection of Northwood PL A, L.P. to Cure Amount* [ECF No. 717]
- (g) *Objection of BPP East Union LLC to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 725]

- (h) *Objection of KMO-361 (Manhasset), LLC to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 727]
- (i) *Objection of BPP East Union LLC to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 731]
- (j) *Objection of Easton Town Center II, LLC to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 734]
- (k) *Tango Analytics LLC's Objection to Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 736]
- (l) *Limited Response of Caastle Inc. to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 737]
- (m) *Reservation of Rights of Landlords, CR Saint Vincent, LLC and CLPF – CC Pavilion, L.P., Regarding Debtors' Assumption or Assignment of Leases Through the Proposed Chapter 11 Plan* [ECF No. 740]
- (n) *Reservation of Rights of Landlords, Asheville Retail Associates LLC, Ned Little Rock LLC, and Palm Beach Outlets I, LLC, Regarding Debtors' Assumption or Assignment of Leases Through the Proposed Chapter 11 Plan* [ECF No. 741]
- (o) *Limited Objection of Garden City Owner LLC, Legacy Place Properties LLC, Market Street Retail South LLC, W/S/M Hingham Properties LLC, W/S Peak Canton Properties LLC, Wilson Canal Place II, LLC, South of Market LLC, Hillsdale Shopping Center LLC, Legacy Place Properties LLC, WS Tampa Owner LLC, BP Prucenter Acquisition LLC and Reston Town Center Property LLC to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 742]
- (p) *K&C IV LLC's and 234 W, LLC's Objection to the Debtors' Notice of Assumption or Assignment and Proposed "Cure Amount" and Failure to Provide Adequate Assurance of Future Performance to Assume the Lease for 234 Wythe Avenue, Brooklyn, New York* [ECF No. 747]
- (q) *91 Fifth Avenue Corp.'s Objection to the Debtors Proposed Assumption of Unexpired Lease of Real Property and Calculation of Related Cure Costs* [ECF No. 748]

- (r) *Response of STRS L3 ACQ1 LLC to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 749]
- (s) *Objection of Bayer Retail Company IV, LLC and Fritz Farm Retail Company, LLC to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 750]
- (t) *The NPD Group's Limited Objection & Reservation of Rights to Notice of Assumption & Cure Amount* [ECF No. 751]
- (u) *Reservation of Rights of Transfair USA d/b/a Fair Trade USA to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 752]
- (v) *Conditional Objection and Reservation of Rights of Factory Lessor LLC to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 753]
- (w) *Objection of Music Lane Owner LLC to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 754]
- (x) *Objection of Legacy West Investors, LP to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 755]
- (y) *ADP, Inc.'s Limited Objection to Debtors' Proposed Cure Amount* [ECF No. 757]
- (z) *Limited Objection and Reservation of Rights of Simon Property Group, Inc. to Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 758]
- (aa) *Oracle America, Inc.'s Rights Reservation Regarding (1) Amended Joint Prearranged Chapter 11 Plan of Reorganization of Chinos Holdings, Inc. and its Affiliated Debtors and (2) Notice of Assumptions or Assignment and Cure Costs Related to Executory Contracts and Unexpired Leases of the Debtors ("Rights Reservation")* [ECF No. 760]
- (bb) *Objection of Atlanta Outlet Shoppes, LLC, Bluegrass Outlet Shoppes CMBS, LLC, OK City Outlets, LLC, Pyramid Management Group, LLC, Westfield, LLC and Certain Affiliates to the Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 761]

- (cc) *Objection and Reservation of Rights of Washington Prime Group Inc. to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 763]
- (dd) *Limited Objection of Experian Marketing Solutions, LLC f/k/a Experian Marketing Solutions, Inc. to Cure Notice* [ECF No. 765]
- (ee) *Conditional Objection and Reservation of Rights of the Americana at Brand, LLC, Palisades Village Co., LLC and the Grove, LLC to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 766]
- (ff) *Objection of Help II, LLC and Harbor East Parcel D-Retail 2, LLC to Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of Debtors* [ECF No. 768]
- (gg) *Objection to Notice of Assumption or Assignment and Cure Costs Relating to the Executory Contracts and Unexpired Leases of the Debtors* [Docket No. 667] [ECF No. 769]
- (hh) *Objection of Salesforce.com to the Proposed Assumption of Certain Executory Contracts and Cure Costs in Connection with the Debtors Joint Prearranged Chapter 11 Plan of Reorganization, and Reservation of Rights* [ECF No. 771]
- (ii) *Declaration of Kevin Ramirez in Support of the Objection of Salesforce.com to the Proposed Assumption of Certain Executory Contracts and Cure Costs in Connection with the Debtors Joint Prearranged Chapter 11 Plan of Reorganization, and Reservation of Rights* [ECF No. 772]
- (jj) *Limited Objection and Reservation of Rights of the Crown Estate Commissioners to the Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases* [ECF No. 773]
- (kk) *Limited Objection of South Coast Plaza [Location #242] to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 774]
- (ll) *Objection of Deloitte Consulting LLP and Deloitte Tax LLP to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 775]
- (mm) *Limited Objection of South Coast Plaza [Location #504] to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 776]

- (nn) *Limited Objection and Reservation of Rights of Aeonian Partners, LP to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 777]
- (oo) *Limited Objection of Acadia Reality Limited Partnership, Brixmor Operating Partnership LP, Centercal Properties, LLC, ERY Retail Podium LLC, Edens, Federal Realty Investment Trust, Gateway Knollwood, LLC, KRE Colonie Owner, LLC, PGIM Real Estate, Related Companies, Retail Properties of America, Inc., Starwood Retail Partners LLC, the Forbes Company, the Macerich Company, Trademark Property Company, and Urban Edge Properties L.P. to Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 780]
- (pp) *Limited Objection of Jemal's Atlantic, LLC to Debtors' Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 785]
- (qq) *Limited Objection of Brookfield Properties Retail, Inc., Hines Global REIT, Jones Lang LaSalle Americas, Inc., Krista Freitag as Receiver for Charlottesville Fashion Square, LLC, Teachers Insurance and Annuity Association of America, and Turnberry Associates to Assumption and Assignment of Leases* [ECF No. 788]
- (rr) *Amended Objection to Debtors' Designated Cure Amount* [DKT #715] [ECF No. 791] filed by CPBP-VII Associates, L.P.
- (ss) *Objection of RCPI Landmark Properties, L.L.C. to Debtors' Proposed Cure Amount and Assumption of Lease* [ECF No. 800]
- (tt) *Safety National Casualty Corporation's Limited Objection Debtors' Amended/Modified Plan and Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 817]
- (uu) *Reservation of Rights with Respect to Notice of Assumption or Assignment and Cure Costs Relating to Executory Contracts and Unexpired Leases of the Debtors* [ECF No. 830] filed by AT&T Corp.
- (vv) *Objection of Takihyo Co., Ltd. To Debtor's Amendments to Cure Notice as Set Forth in Notice of Filing Amendments to Cure Notice* [Docket No. 903] [ECF No. 923]

Status: Each of the Cure Objections is adjourned to the Omnibus Hearing scheduled for October 22, 2020, at 11:00 a.m. (Eastern Time) (the “**October Omnibus Hearing**”).

II. UNCONTESTED MATTERS

2. **“First Omnibus Objection to Claims”** – *Debtors’ First Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 668]

Related Documents:

- (a) *Notice of Hearing on Debtors’ First Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 668]

Response Deadline: September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry.

3. **“Second Omnibus Objection to Claims”** – *Debtors’ Second Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 669]

Related Documents:

- (a) *Notice of Hearing on Debtors’ Second Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 669]

Response Deadline: September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry.

4. **“Third Omnibus Objection to Claims”** – *Debtors’ Third Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 670]

Related Documents:

- (a) *Notice of Hearing on Debtors’ Third Omnibus Objection to Claims (Reclassification of Wrong Debtor Claims)* [ECF No. 670]

Response Deadline: September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry.

5. **“Fourth Omnibus Objection to Claims”** – *Debtors’ Fourth Omnibus Objection to Claims (Duplicate Claims)* [ECF No. 671]

Related Documents:

(a) *Notice of Hearing on Debtors' Fourth Omnibus Objection to Claims (Duplicate Claims)* [ECF No. 671]

Response Deadline: September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry.

6. **“Fifth Omnibus Objection”** – *Debtors' Fifth Omnibus Objection to Claims (No Liability Claims)* [ECF No. 672]

Related Documents:

(a) *Notice of Hearing on Debtors' Fifth Omnibus Objection to Claims (No Liability Claims)* [ECF No. 669]

Response Deadline: September 17, 2020.

Responses:

(a) *United States' Response in Opposition to Debtors' Fifth Omnibus Objection to Claims (No Liability Claims)* [ECF No. 920] (the **“IRS Response”**)

Status: The Reorganized Debtors will submit a final order to the Court for entry that excludes the claims filed by AIG Property Casualty Inc. and the claims associated with the IRS Response. The hearing with respect to the claims filed by AIG Property Casualty Inc. and the claims associated with the IRS Response is adjourned until the October Omnibus Hearing.

7. **“Sixth Omnibus Objection to Claims”** – *Debtors' Sixth Omnibus Objection to Claims (Amended and Superseded Claims)* [ECF No. 673]

Related Documents:

(a) *Notice of Hearing on Debtors' Sixth Omnibus Objection to Claims (Amended and Superseded Claims)* [ECF No. 673]

Response Deadline: Except as expressly agreed by the Debtors and any applicable party in interest, the response deadline was September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry that excludes the claims filed by Mitsui Bussan I-Fashion Ltd. The hearing with respect to the claims filed by Mitsui Bussan I-Fashion Ltd. is adjourned until the October Omnibus Hearing.

8. **“Seventh Omnibus Objection to Claims”** – *Debtors’ Seventh Omnibus Objection to Claims (Amended and Superseded Claims)* [ECF No. 674]

Related Documents:

(a) *Notice of Hearing on Debtors’ Seventh Omnibus Objection to Claims (Amended and Superseded Claims)* [ECF No. 674]

Response Deadline: September 17, 2020.

Responses: None.

Status: The Reorganized Debtors will submit a final order to the Court for entry.

Dated: September 22, 2020
Richmond, Virginia

/s/ Henry P. (Toby) Long, III
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